



REQUEST FOR CONFIDENTIAL TREATMENT PURSUANT TO 47 C.F.R. § 0.459

February 3, 2020

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Notice, IBFS File No. SAT-LOA-20190704-00057; Call Sign S3051

Dear Ms. Dortch:

Kuiper Systems LLC (“Amazon”) requests confidential treatment under Section 0.459 of the Commission’s rules¹ for the company-specific and sensitive commercial information contained in the stills from videos shown to Commission personnel in the course of *ex parte* meetings held on January 30, 2020, January 31, 2020, and February 3, 2020.

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, Amazon states:

1. Identification of the specific information for which confidential treatment is sought.

The information for which confidentiality is being sought (“the Information”) appears in the video stills in the attachment accompanying this letter. The Information consists of commercially sensitive details regarding the planned deployment of the Kuiper System.

2. Identification of the circumstance giving rise to the submission.

The Information was submitted pursuant to *ex parte* presentations given to the Chairman and the commissioners.

¹ 47 C.F.R. § 0.459.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The Information consists of commercially sensitive details regarding its deployment strategy and is limited only to that sensitive information. This information is highly confidential.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Information relates to Amazon's deployment of a non-geostationary orbit, fixed satellite service constellation that will deliver high-capacity, low-latency broadband.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the Information would reveal non-public information about Amazon's deployment strategy.

6. Identification of any measures taken to prevent unauthorized disclosure.

To Amazon's knowledge, the Information has not been made publicly available due to the commercially sensitive nature of the data it contains.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The Information is not available to the public and has not been disclosed to the public.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

The Information should remain confidential until Amazon causes to be made public the deployment plans of the Kuiper System.

Respectfully submitted,

/s/ *Mariah Dodson Shuman*

Mariah Dodson Shuman
Corporate Counsel
Kuiper Systems LLC,
an Amazon subsidiary